



<b>Sheriff Leon Lott</b>	<b>c/o Robert Garfield, Esq.</b>
<b>David Y. Wilson</b>	<b>c/o Robert Garfield, Esq.</b>
<b>Capt. Heidi Jackson</b>	<b>c/o Robert Garfield, Esq.</b>
<b>Lt. Chris Lindler</b>	<b>c/o Robert Garfield, Esq.</b>
<b>Lt. Larry Payne</b>	<b>c/o Robert Garfield, Esq.</b>
<b>Lt. Zane Padgett</b>	<b>c/o Robert Garfield, Esq.</b>
<b>Capt. Brain Godfrey</b>	<b>c/o Robert Garfield, Esq.</b>
<b>Dep. Chief Stanley Smith</b>	<b>c/o Robert Garfield, Esq.</b>
<b>Sgt. Amy Lutz</b>	<b>c/o Robert Garfield, Esq.</b>
<b>Samuel Berkheimer</b>	<b>c/o Robert Garfield, Esq.</b>
<b>Ben Fields</b>	<b>Address unknown</b>
<b>Joanna McDuffie, Esq.</b>	<b>c/o Robert Garfield, Esq.</b>
<b>Jeff Temoney</b>	<b>c/o Jasmine Rogers Drain, Esq.</b>
<b>Stacey Baker</b>	<b>c/o Jasmine Rogers Drain, Esq.</b>
<b>April Shell</b>	<b>c/o Jasmine Rogers Drain, Esq.</b>
<b>Traci Batchelder</b>	<b>c/o Jasmine Rogers Drain, Esq.</b>
<b>Martha Fenske</b>	<b>Address unknown</b>
<b>Paul Dobyns</b>	<b>c/o Jasmine Rogers Drain, Esq.</b>
<b>Baron Davis</b>	<b>c/o Jasmine Rogers Drain, Esq.</b>
<b>Debbie Hamm</b>	<b>c/o Jasmine Rogers Drain, Esq.</b>
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**In addition to the above-named witnesses, Plaintiff reserves the right to call any witness listed by the Defendants.**

**Plaintiff also reserves the right to call any witness listed in discovery or presented in Defendants' case in chief as a rebuttal witness.**

**Additionally, to the extent necessary, Plaintiff reserves the right to call a record custodian to authenticate records.**

(II) Provide the designation of testimony of witnesses to be presented by deposition transcript.

**ANSWER:**

**Plaintiff expects to call all witnesses to testify in person. Pursuant to Fed. R. Civ. P. 32(a)(2), Plaintiff reserves the right to introduce any portion of any transcript for the**

**purpose of impeachment. Additionally, Plaintiff reserves the right to publish in accordance with Fed. R. Civ. P. 32(a)(4) depositions of deponents should any become unavailable witnesses during the trial. Finally, the Plaintiff reserves the right to introduce any portion of any transcript of a party pursuant to Fed. R. Civ. P. 32(a)(3).**

(III) Documents or other exhibits, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises.

- a. 04/18/2018 Forensic Interview of minor Jane Doe;**
- b. 04/20/2018 Forensic Interview of minor Jane Doe;**
- c. Videotaped pre-polygraph interview and polygraph examination of Jamel Bradley;**
- d. 04/19/18 Richland County Sheriff's Department polygraph records of Jamel Bradley (Bates Polygraph 00001-00024)(432-M-001 to 018);**
- e. David Wilson handwritten notes (Wilson Depo. Ex. 1);**
- f. 2011 Internal Affairs File (Bates 432-B-024 to 038);**
- g. Target Inquiry (Bates 432-B-022 to 023; 432-B-007 to 010);**
- h. May 2016 Internal Affairs File (Bates 432-B-001 to 021);**
- i. Jane Doe 2018 Internal Affairs File (Bates 432-C-001 to 016);**
- j. Jane Doe CID File (Bates 432-D-001 to 061);**
- k. August 29, 2018 Bradley Investigation Employee Case File History (Bates 432-B-039);**
- l. Richland County Sheriff's Department Personnel File of Jamel Bradley (Bates 432-A-001 to 139);**

- m. Richland County Sheriff's Department supplemented Personnel File of Jamel Bradley (Bates 432-T-001 to 023);**
- n. Bradley Employment Records (Bates 432-F-001 to 029);**
- o. Pre-employment polygraph report, polygraph chart, and pre-employment screening of Deputy Bradley (Bates 432-L-001 to 013);**
- p. Memo from Captain Jackson and Lindler to Sheriff Lott (Bates 432-N-001 to 002);**
- q. 2010-2019 SRO Memo of Agreement between School District and RCSD (Bates 432-O-001 to 073);**
- r. Ben Fields HR File-Redacted (Bates 432-P-001 to 208);**
- s. Dept of Justice ltr to Sheriff 2016-08-10 (Bates 432-R-001 to 025);**
- t. Dept of Justice ltr to Sheriff 2019-09-30 (Bates 432-S-001 to 005);**
- u. Policies & Procedures (4-9-19) (Bates 432-P&Ps-001 to 324);**
- v. 11/25/19 Incident Report;**
- w. Jamel Bradley Termination File (Bates 432-W-001 to 012);**
- x. 07/16/18 SC Criminal Justice Academy Records of Jamel Bradley;**
- y. 11/25/19 SC Criminal Justice Academy Updated Records of Jamel Bradley;**
- z. District 00001-00004 Notes of Stacey Baker;**
- aa. District 00005-00055 School records of Jane Doe;**
- bb. District 00056 Letter from Cleve Smith to Captain Ewing;**
- cc. District 00057-00064 SRO Assignments;**
- dd. District 00065-00076 2017-2018 SRO Memorandum of Agreement;**
- ee. District 00087-00130 2016-2017 School Handbook;**
- ff. District 00131-00178 2017-2018 School Handbook;**

- gg. District 00227-00302 Email Communications;**
- hh. District 00312-00326 Communication between Captain H. Jackson and C. Lindler;**
- ii. District 00327-00358 Communication between Susan Yelverton;**
- jj. District 00360-00378 Richland County School District 2 Policies and Procedures;**
- kk. District 00379-00411 Communications between Jane Doe and Jamel Bradley;**
- ll. District 00412 Communication between Jane Doe and Jamel Bradley;**
- mm. District 00413-00428 Communication between H. Jackson and C. Lindler;**
- nn. District 00429-00452 Communication between Mother Doe and Jane Doe;**
- oo. District 00453-00454 Doe Emails;**
- pp. District 00455-00485 SVHS Training Documents;**
- qq. District 00630-00637 SVHS SRO Assignments;**
- rr. District 00638-00683 SVHS SRO Evaluation Documents;**
- ss. District 00684-00693 Communication with C. Lindler and H. Jackson;**
- tt. District 00694-00719 Communication with Parent A re 2016;**
- uu. District 00720-00742 Communication RCSD re 2016 allegation;**
- vv. District 00743-00774 SRO Assignments;**
- ww. District 00775-00777 WIS-TV Inquiry;**
- xx. District 00778-00780 Emails between Ewing and C. Smith re Bradley's assignments;**
- yy. District 00781-00915 Communication State re FOIA Request;**
- zz. District 01067-01072 Bradley's emails regarding C.E.;**
- aaa. District 01075-01077 Emails with J.W.;**
- bbb. District 01078-01081 Bradley emails with C.E.;**

- ccc. District 01082-01145 Emails between Bradley & C.E.;**
- ddd. District 001146-01168 Communication between RCSD & District re complaint by R.M.;**
- eee. District 01169-01219 Emails between Bradley & Jane Doe;**
- fff. District 01220-01224 Complaints from R. M.;**
- ggg. District 01225-01228 March 21, 2018 parent complaint re Bradley;**
- hhh. District 01229-01294 Emails to & from Susan Yelverton;**
- iii. District 01295-01296 2015 teacher concern re Bradley;**
- jjj. District 01297-01304 Emails re Jane Doe;**
- kkk. District 01305-01341 Communications with Captain Heidi Jackson;**
- lll. District 01342-01344 Communications re Bradley's assignments;**
- mmm. District 01345-01346 Communications re Jane Doe;**
- nnn. District 01347-01352 SRO Placements;**
- ooo. District 01353 Notes from Paul Dobyns;**
- ppp. District 01354-01356 C.E. Emails;**
- qqq. District 01357-01362 State article on Bradley;**
- rrr. District 01363-01673 Title IX training materials;**
- sss. District 01674-01845 Additional school records produced by the District 2;**
- ttt. District 01846-02214 Student Sexual Abuse Training;**
- uuu. District 02215-2226 Additional school records of Jane Doe;**
- vvv. District 03161-03170 Bradley Assignments 2018-2019;**
- www. District 03208-03277 Various Emails re Bradley;**
- xxx. District 03278-03284 11/14/19 2019 Investigation of additional victim(s);**

- yyy. Confidential medical records of Jane Doe (Bates Palmetto Health 00001-00059);**
- zzz. Medical billing of Prisma Health Baptist Hospital;**
- aaaa. Confidential medical records of Metropolitan Children's Advocacy Center of Jane Doe (Bates Metro Children's Advocacy 00001-00011);**
- bbbb. Confidential medical records of Montcrief Army Health Clinic of Jane Doe (Bates Montcrief 00001-00881);**
- cccc. Verizon records for obtained by way of Plaintiff subpoena (Bradley-Personal 00001-00104);**
- dddd. Verizon records obtained by way of Plaintiff subpoena (Bradley-RCSO Sheriff 00001-00131);**
- eeee. Report and Curriculum Vitae of Daniel Swinton;**
- ffff. Report and Curriculum Vitae of Julie Duff;**
- gggg. Report and Curriculum Vitae of Amanda Salas, MD;**
- hhhh. Report and Curriculum Vitae of Roy Taylor;**
- iiii. Order Granting Mother Doe's Motion for Injunctive Relief;**
- jjjj. Mother Doe v. Richland County Sheriff, Summons and Complaint 2018-CP-40-03800;**
- kkkk. BWC Vest Camera Videos (4);**
- llll. Cell phone dump of (803) 319-\*\*\*\*;**
- mmmm. Cell phone dump of (803) 518-\*\*\*\*;**
- nnnn. November 20, 2019 Press release video of Sheriff Lott;**
- oooo. Plaintiff reserves the right to use any and all records produced by any**

**defendant, including all discovery produced by Defendant Richland County School District and Defendant Richland County Sheriff's Department, Bradley, and the corresponding written discovery responses;**

**pppp. Plaintiff reserves the right to use any deposition, previous statement, and/or transcript for purposes of impeachment or other use provided by the Federal Rules of Evidence;**

**qqqq. Plaintiff reserves the right to use any demonstrative exhibits as are deemed admissible at the trial of the case; and**

**rrrr. Plaintiff reserves the right to include any exhibits listed by any Defendant.**

Respectfully Submitted,

*s/ James B. Moore III*

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May 18, 2020  
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